UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

January 5, 2006

Reply To
Attn Of: ETPA-088

Ref: 05-010-BPA

Gene Lynard
Bonneville Power Administration, KEC-4
P.O. Box 12999
Portland, OR 97208-3621

Mr. Lynard:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed **Klondike III/Biglow Canyon Wind Integration Project** in Sherman County, Oregon. The review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. This section of the Clean Air Act specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review considers not only the impact to the environment but also the adequacy of the NEPA document itself.

The NOI states that Bonneville Power Administration (BPA) plans to analyze environmental impacts of actions associated with interconnection and integration of electrical power from two wind power generation farms, Klondike III and Biglow Canyon, into the Federal Columbia River Transmission System (FCRTS). The BPA proposed actions include: 1) agreements with Orion and PPM to provide interconnection services, 2) construction and operation of an approximately 12-mile double-circuit 230 kV transmission line, 3) building and operating a new 230 kV Substation, and 4) expansion and placement of new equipment in BPA's existing John Day 500-kV Substation. We support the decision to combine the two wind projects in one EIS and evaluate cumulative impacts.

EPA supports development of alternative and environmentally sustainable sources of energy such as wind power. The attached comments are provided to inform BPA of the project's potential environmental issues that EPA believes should be considered as the draft EIS is being developed.

We appreciate the opportunity to offer our comments at this stage of your planning process for this project. If you need more information or have questions about our comments, please contact me at (206) 553-6322 or by electronic mail at mbabaliye.theogene@epa.gov.

Sincerely

//s//

Theogene Mbabaliye
NEPA Review Unit

EPA's Detailed Scoping Comments on Klondike III/Biglow Canyon Wind Integration Project

Range of Alternatives

The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process. This will ensure that the EIS provides the public and the decision-maker with information that sharply defines the issues and identifies a clear basis for choice as required by NEPA. The Council on Environmental Quality recommends that all reasonable alternatives should be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS for the proposed project. EPA encourages selection of feasible alternatives and that will minimize environmental degradation.

Environmental Effects

The EIS should include environmental effects and mitigation measures. This would involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and a listing of mitigation measures for the impacts. Anticipated construction and other operational activities are likely to disturb soils and vegetation, which could result in significant impacts on water quality, wildlife, and other resources.

Water Quality

Preventing water quality degradation is one of EPA's primary concerns. Water quality may be adversely affected if construction alters the hydrology of springs and surface runoff such that erosion carries sediment to tributaries and ultimately to streams. The EIS should disclose which waterbodies may be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters. Along with the disclosure of impacts, the EIS should state appropriate Best Management Practices (BMPs) that would be used to minimize the impacts. For construction activities that would disturb more than one acre (40 CFR 122.26 (b)), a National Pollutant Discharge Elimination System (NPDES) stormwater permit is required. The Oregon Department of Environmental Quality (ODEQ) is the NPDES permitting authority for Oregon and should be contacted to obtain the NPDES permit. We recommend that the EIS include information about this permit.

Habitat, Vegetation, and Wildlife

During construction of the proposed project, vegetation would be cleared and soils moved during construction of roads, establishment of wind turbine foundations, and building of substation and other facilities. The EIS should describe the current quality and capacity of habitat, its use by wildlife in the proposed project area, especially bats and avian populations. Wind energy generation projects have the potential to disrupt important wildlife species habitat, resulting in mortality of migratory species such as birds and bats due to collisions with rotors.

The EIS should describe the critical habitat for the species; identify any impacts the proposed project will have on the species and their critical habitats; and how the proposed project will meet all requirements under the Endangered Species Act (ESA), including consultation with the U.S. Fish and Wildlife Service (FWS), National Oceanographic Atmospheric Administration (NOAA), and the Oregon Department of Fish and Wildlife (ODFW). The BPA actions should promote the recovery of declining populations of species.

If any pesticides and herbicides will be used for vegetation treatment during the proposed project operations, the EIS should address any potential toxic hazards related to the application of the chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized. If vegetation would be burnt, then the EIS should include a smoke management program that would be followed to reduce public health impacts and potential ambient air quality exceedances.

Cumulative and Indirect Impacts

The proposed project should assess impacts over the entire area of impact. The project evaluation should consider the effects of the proposed project when added to other past, present and reasonably foreseeable future projects in and outside the project corridor, including those by entities not affiliated with BPA. These impacts can result from individually minor, but collectively significant, actions taking place over time. For example, the proposed project has the potential to impact air quality in the short term due to construction activities and in the longer term due to traffic on unpaved roads, emissions from vehicles and on-site operations, and cumulative impacts from surrounding activities such as agriculture and fire.

EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, which can be found on EPA web site at: http://www.epa.gov/compliance/resources/nepa.html. This guidance includes five key areas to focus on when assessing cumulative effects.

1. Identifies resources if any, that are being cumulatively impacted;
2. Determines the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and will occur;
3. Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
4. Describes a benchmark or baseline;
5. Includes scientifically defensible threshold levels.

Public Participation and Environmental Justice

The proposed wind power integration project should include potential impacts on low income or people of color communities. The project evaluation should consider how to meet environmental justice requirements consistent with Executive Order (EO) 12898 (*Federal Actions to Address Environmental Justice in Minority and Low-Income Populations).*

The EIS process should also be used as an opportunity to engage with the public in dialogue about the power management project and its impact on local resources. Community acceptance for such projects may be easier if there are shared opportunities, such as local employment, economic, recreation, and other benefits.

Consultation with Tribes

If the proposed project will have impacts on historical or traditional cultural places of importance to tribes in the area, then the EIS should include identification of historic resources, and assurance that the tribes' treaty rights and privileges have been addressed. Consultation with all affected tribal governments is stipulated in the Executive Order (EO) 13175 (*Consultation and Coordination with Indian Tribal Governments)*. This order states that the U.S. Government will continue "to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights." EPA recommends that the EIS include information on the process used to consult with the tribes and outcomes of such consultations.

Monitoring

EPA supports project strategies that include monitoring, which is a necessary and crucial element in identifying and understanding the consequences of actions. The proposed project could be designed to include an effective feedback element, including implementation and effectiveness monitoring. Since wind power technology and configuration of wind turbines in this area are still relatively new, effective adaptive management would also be important to minimize and mitigate impacts.